UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

March 5, 2012

Mr. Jack Van Dop
Federal Highway Administration
Eastern Federal Lands Highway Division
21400 Ridgetop Circle
Sterling, VA 20166

Re: 14th Street Bridge Corridor, Arlington, Virginia to Washington, DC, Draft Environmental Impact Statement/Draft Section 4(f) Evaluation, CEQ # 20120008

Dear Mr. Van Dop:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the United States Environmental Protection Agency (EPA) has reviewed the 14th Street Bridge Corridor Project Draft Environmental Impact Statement (DEIS). The DEIS, prepared by the Federal Highway Administration, Eastern Federal Lands Highway Division, recommends retaining 13 alternatives for further study in the Final EIS. Based on our review, we have rated the environmental impacts of Bicycle/Pedestrian Alternative 2 as EC (Environmental Concerns) and the adequacy of the impact statement as 2 (Insufficient Information). We have rated the other alternatives as LO (Lack of Objection). A description of our rating system can be found at: http://www.epa.gov/compliance/nepa/comments/ratings.html. Since there is no preferred alternative identified of the 13 presented, the rating of the document is based on the highest rating of the individual alternatives (EC-2)

A range of alternatives were identified and analyzed that addressed the conditions of limited capacity of the roadway network and rail system. Results of a comprehensive evaluation of operational performance, environmental impacts, cost effectiveness, and implementation level resulted in the selection of alternatives retained for further study in the FEIS.

Bicycle/Pedestrian Alternatives

- Action Alternative 1: Improve bicycle and pedestrian access to the Mason Bridge by making improvements at each end of the bridge
- Action Alternative 2: Construct separated bicycle/pedestrian crossing of the Potomac River and add a grade-separated bicycle crossing of GWMP as proposed by Arlington County
- Action Alternative 3: Create integrated (DC_VA_NPS) bicycle system, including signing for commuters and other destination bikers

Highway Alternatives

- Action Alternative 4: Construct geometric improvements at I-395 & 9th St
- Action Alternative 6: ReduceI-395 access points at Boundary Channel Drive
- Action Alternative 7: Eliminate turn movements at 14th Street and C Street intersection

Transit Alternative

- Action Alternative 13 Modified: Construct bus lanes between Pentagon Transit Center and 14th St at C street, using inside shoulders on Rochambeau Bridge and TSP treatment

Management Alternatives

- Management Alternative 1: Expand, formalize, and increase incentives for telecommuting
- Management Alternative 2: Increase participation in flexible work hours program
- Management Alternative 3: Implement parking management strategies/increase parking prices and /or decrease supply
- Management Alternative 5: Strengthen coordination and management in corridor
- Management Alternative 7: Develop driver education program specific to corridor
- Management Alternative 8: Implement signing modification

The basis for the EC-2 rating is that a new 16 foot wide 2,500 foot long bridge would be constructed 30 feet above the Potomac River. The DEIS states that up to 6.53 acres of the Potomac River would be impacted by the new construction. The impact to the river was determined by providing a 50 foot offset from the proposed bridge for the entire width of the river. Preliminary design has yet to occur but it is assumed that spacing between the piers will be approximately 150 feet to mimic pier locations on adjacent bridges and for navigation lanes. There is no information provided on how the bridge will be construction or how impacts will be mitigated. Both construction and permanent placement of a bridge with piers in the river will have a negative impact on the aquatic environment. Every effort should be made to avoid and minimize impacts associated with this alternative, including construction methods and design. More detailed comments on environmental resource impacts and Environmental Justice analysis are provided in the attachment to this letter for your consideration.

EPA appreciates the opportunity to review and comment on the 14th Street Bridge Corridor Project. If you have any questions or would like to discuss our comments, please contact Barbara Okorn at (215)814-3330 or okorn.barbara@epa.gov.

Sincerely,

Barbara Rudnick
NEPA Team Leader

Attachment

14th Street Bridge Corridor Project Draft Environmental Impact Statement
Detailed Comments

Environmental Impacts

- Table 4.1 on page 4-2 states that 4.45 acres of river and 2.42 acres of floodplain will be impacted by Alternative 2. Page 4-25 states that 4.45 acres will be impacted and page 4-33 states 6.53 acres of Potomac River will be impacted by the same alternative. Please clarify which number of acres is accurate?
- No information on construction methods and designs for the bridge are provided. In addition the DEIS does not include mitigation for the impacts to the Potomac River associated with the bridge.
- The project team should continue to look at options for all alternatives that avoid and minimize impacts to the human and natural environment.
- Additional discussion should be provided on storm water management.
- Page 3-15 has tables of concepts being studied or implemented under a separate project. If available, more information should be provided on how these will be managed (i.e. who is the lead federal agency, what level of NEPA documentation will be conducted, etc)
- The project team should continue coordination with other agencies regarding impacts from project (threatened and endangered species, aquatic, park land, and historic resources, etc).

Environmental Justice

- The analyses used to identify minority and low income populations is described as follows: " In this analysis, census tracts with a minority population greater than 50 percent and/or poverty levels greater than 50 percent are eligible for environmental justice classification." It is recommended that a two stage approach be taken in this assessment to assure that areas of potential Environmental Justice Concern be given full consideration, and that all efforts be made to assure that no at-risk populations be left behind. In light of the fact that the populations differ considerably in demographic makeup when considering the Virginia and District of Columbia populations, it is suggested that analyses use a first screening level of 50 percent minority population, supplemented with analyses assessing the percent minority as measured against the state and or county averages. That is, a minority population is one that has a minority population of greater than 50 percent, or where the minority population percentage exceeds the county/state average. This will add balance and give a greater perspective to the assessment. Applying this methodology to the poverty assessment will be beneficial. It seems unreasonable to raise the bar to 50 percent low income in a county population where only 15 percent of the population lives below poverty, for example. Therefore, a low income population is one that has a low income population of greater than 50 percent, or where the low income population percentage exceeds the county/state average. All of the demographic statistics for each of the study census tracts should also be provided.